

Action: B.D. Petterman/RT Agg

E. V. V. V.

1. Green 7-1

# STATE OF COLORADO

## COLORADO DEPARTMENT OF HEALTH

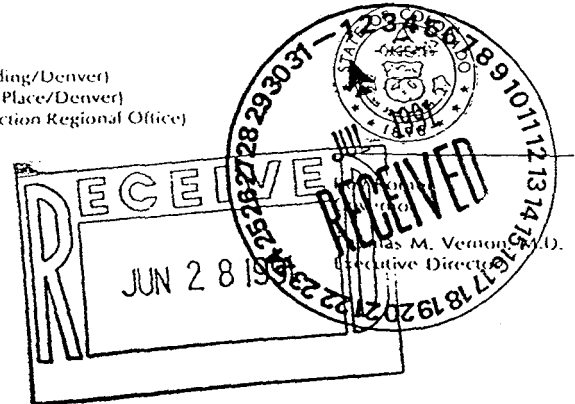
4210 East 11th Avenue  
Denver, Colorado 80220-3716  
Phone (303) 320-8333

Telefax:  
(303) 322-9076 (Main Building/Denver)  
(303) 320-1529 (Plattin Place/Denver)  
(303) 248-7198 (Grand Junction Regional Office)

Due end of June 91

June 24, 1991

Mr. David P. Simonson  
Assistant Manager for Environmental Management  
Department of Energy  
Rockt Flats Office  
P.O. Box 928  
Golden, CO 80402-0928



Dear Mr. Simonson:

The Colorado Department of Health (CDH), and the Environmental Protection Agency (EPA) have considered both the "change to interim status" and the "interim measure/interim remedial action (IM/IRA)" approaches for dewatering the solar ponds and treating the solar pond leachate. CDH and EPA have been decided that the "change to interim status" approach is not appropriate and that the IM/IRA approach can succeed in dewatering the ponds in a timely manner and avert potential negative public reaction by working through the IM/IRA process which includes a sixty-day public comment period.

The IM/IRA process is defined in the Interagency Agreement (IAG). Required submittals and schedule commitments are outlined below.

1. Draft Proposed IM/IRA Decision Document including Draft ARAR analysis.
  - a. CDH, EPA Review and Comment
2. Proposed IM/IRA Decision Document includes response to CDH and EPA Comments.
  - a. CDH, EPA and Public Comments (60 Day with optional hearing)
3. Final IM/IRA Decision Document with Responsiveness Summary to all comments.
  - a. CDH, EPA review and approve.
4. Final Approved IM/IRA Decision Document with Responsiveness Summary. (Released to public 10 days before "any" activities begin)
  - a. Completion of design work specified in Final Approved IM/IRA Decision Document.
5. IM/IRA Implementation Document with appropriate drawings, specification, cost estimates, etc.
  - a. Monthly Progress Reports.

The duration of EPA/CDH reviews and DOE documents revisions can be significantly shortened by working together.

The flash evaporators and the surge tanks should be presented as a single alternative. The "Draft Proposed IM/IRA Decision Document" should include a draft ARAR analysis, two alternative proposals for

ADMIN RECORD

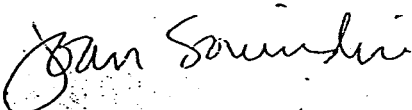
A-DU04-000022

dewatering the the solar ponds, and air emissions information on the flash evaporator. The "Draft Proposed IM/IRA Decision Document" will be accepted in place of the "change to interim status package" at the end of June 1991 as referenced in your June 13, 1991 letter. It should be noted that delay in this submittal may adversely affect DOE's ability to meet enforceable IAG milestone dates.

EPA and CDH have agreed to review the document as quickly as possible so the public comment period may begin as early as late July 1991 and will end in late September 1991. We recommend that the parties to the IAG meet the afternoon of July 3, 1991, to discuss and formalize a schedule for this important commitment.

Please contact Noreen Matsuura of my staff at 331-4920, to confirm the July 3, 1991 meeting date, location and time.

Sincerely,



*Gar*  
Gary W. Baughman, Unit Leader  
Hazardous Waste Facilities

cc. Martin Hestmark, EPA  
Arturo Duran, EPA  
Thomas E. Lukow, DOE  
Fraser Lockhart, DOE  
- Jack M. Kersh, EG&G  
Dan Miller, AGO  
Fred Dowsett, CDH  
Barbara Barry, RFPU